

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) BRIAN THOMPSON, individually;      )  
and    )  
(2) JENNIFER JAMES, individually,      )  
    )  
Plaintiffs,                                )  
    )  
v.    )  
    ) Case No. CIV-23-1074-R  
(3) J. GRAY TEEKELL, individually;      ) Judge David L. Russell  
(4) THE TEEKELL COMPANY, INC.;      )  
(5) MICHAEL E. KRASNOW, Trustee      )  
of Morton Family Irrevocable Trust, and )  
(6) RYAN TAYLOR MORTON,      )  
Individually.                                )  
Defendants.                                )

**MOTION FOR LEAVE TO AMEND COMPLAINT  
TO ADD NECESSARY PARTY**

Plaintiffs Brian Thompson (“Thompson”) and Jennifer James (“James”) (collectively “Plaintiffs”) for their claims against Defendants, J. Gray Teekell (“Teekell”), The Teekell Company, Inc. (“TCA”), Mike Krasnow (“Trustee”), the Trustee of Morton Family Irrevocable Trust, an Oklahoma Trust, and Ryan Taylor Morton (“Ryan Morton”) allege, and state as follows:

1. On January 23, 2024, the Court ordered that Ryan Taylor Morton is a beneficiary of the Morton Family Trust and as a beneficiary must be included in this case.
2. Plaintiffs have prepared the attached Second Amended Complaint adding Ryan Morton as a defendant but realigned as a plaintiff by virtue of the Court’s Order.

3. Plaintiffs have provided a copy of the proposed Second Amended Complaint to opposing counsel who have not objected to its filing.

WHEREFORE, Plaintiffs pray that the Court grant leave to file the attached Second Amended Complaint to add necessary parties, in accordance with Court Order dated January 23, 2024.

Date: March 25, 2023.

Respectfully submitted,

s/Shannon F. Davies

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of March 2024, a true and correct copy of the above and foregoing document was filed electronically with the Clerk of Court via the CM/ECF system which will send notifications of such filing to all counsel of record:

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s/Shannon F. Davies  
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